

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 5:19-CR-00247

NATALIE P. COCHRAN

**THIRD SUPPLMENTAL RESPONSE OF THE UNITED STATES OF AMERICA
TO DEFENDANT'S STANDARD DISCOVERY REQUESTS AND
THIRD REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY**

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Rule 16.1(a) of the Local Rules of Criminal Procedure, and the Arraignment Order and Standard Discovery Request entered by the Court in this case on September 30, 2019, the United States of America, by counsel, herewith responds to each of defendant's Standard Discovery Requests as follows:

Request E: Permit the defendant to inspect and to copy or photograph books, papers, documents, data, photographs, tangible objects, building or places, or copies or portions of any of those items, if the item is within the government's possession, custody or control, and (i) the item is material to preparing the defense; (ii) the government intends to use the item in its case-in-chief at trial; or (iii) the item was obtained from or belongs to defendant. [Fed. R. Crim. P. 16(a)(1)(E)]

Response: The following categories of documents and records enclosed are more specifically identified on the Bates Index provided with this response: documents provided by the Department of Homeland Security, text messages, financial documents and notes

voluntarily produced by investors, additional responses from Grand Jury subpoenas from JP Morgan Chase, Bank of America, City National Bank, Premier Bank, UPS and JP Morgan Chase Bank, and memoranda of interview of the Bolts, recordings of Karen Ewing and Court Nexsen's interviews.

REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY

Pursuant to Rules 16.1(b) and 16.1(d) of the Local Rules of Criminal Procedure, the United States of America requests that defendant provide all applicable reciprocal discovery within 14 days of the service of this response and the provision of materials requested by defendant in the Standard Discovery Request.

Respectfully submitted,

MICHAEL B. STUART
United States Attorney

By:

/s/ Kathleen E. Robeson
KATHLEEN E. ROBESON
Assistant United States Attorney
VA Bar No. 89526
300 Virginia Street, East
Room 4000
Charleston, WV 25301
Telephone: 304-345-2200
Fax: 304-347-5104
Email: kathleen.robeson@usdoj.gov

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "THIRD SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA TO DEFENDANT'S STANDARD DISCOVERY REQUESTS AND THIRD REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY" has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing and by hand-delivery this 6th day of May, 2020 to:

Rhett H. Johnson
Assistant Federal Public Defender
300 Virginia Street, East
Room 3400
Charleston, WV 25301
Telephone: 304-347-3372
Email: Rhett_Johnson@fd.org

/s/ Kathleen E. Robeson
KATHLEEN E. ROBESON
Assistant United States Attorney
VA Bar No. 89526
300 Virginia Street, East
Room 4000
Charleston, WV 25301
Telephone: 304-345-2200
Fax: 304-347-5104
Email: kathleen.robeson@usdoj.gov